

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: January 31, 2024 at 10:30 A.M. ET

Objection Deadline: January 12, 2024 at 4:00 P.M. ET

Ref. Nos. 5114 & 5117

**CERTIFICATION OF COUNSEL REGARDING
DEBTORS' SEVENTH (SUBSTANTIVE) OMNIBUS OBJECTION
TO CERTAIN OVERSTATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On December 22, 2023, the Debtors filed the *Debtors' Seventh (Substantive) Omnibus Objection to Certain Overstated Proofs of Claim (Customer Claims)* [D.I. 5114, redacted & 5117, sealed] (the “Objection”).

2. Pursuant to the *Notice of Objection* attached to the Objection [D.I. 5114-1 & 5117-1], any responses to the Objection were to be filed no later than January 12, 2024, at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).

3. The Debtors received informal responses (collectively, the “Informal Responses”) to the objection from the holders of claim number 46220 and claim number 62736.

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. As of the date hereof, no other formal objections or other responses to the Objection have been filed or served on the Debtors, besides the Informal Responses.

5. The parties have agreed to adjourn the Objection solely as with regard to claim number 46220. The Objection solely with regard to claim 62736 is withdrawn without prejudice and all rights of the parties are reserved with regard thereto. Accordingly, the Debtors have revised the proposed form of order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the adjournment and withdrawal. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee (the “U.S. Trustee”) and the Official Committee of Unsecured Creditors (the “Committee”), who have confirmed that they have no objection to the entry of the Revised Order. In accordance with the Court’s electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: January 29, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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